

Illinois Power Company
500 South 27th Street
Decatur, Illinois 62521-2200

US EPA RECORDS CENTER REGION 5



450235

VIA Facsimile and Regular Mail**October 27, 2000****ILLINOIS POWER**

Part of the DYNEX Performance Team

RoseMarie Cazeau, Chief
Environmental Bureau
Assistant Attorney General
188 West Randolph Street, 20th Floor
Chicago, IL 60602

RE: Request for Information
a. Regulator Removal Procedure

Dear Ms. Cazeau:

This is in response to your Request for Information dated October 23, 2000. With respect to your request for follow-up to Illinois Power Company's responses to your September 20, 2000 Request for Information, Illinois Power Company ("IP") provides the following information:

1. In early September, IP personnel that read gas meters for billing purposes (consisting of approximately 120 individuals), were trained to recognize devices on IP's gas distribution system that potentially contain mercury. Since mercury-containing gas regulators on Illinois Power's gas distribution system were horizontally-mounted, these individuals were trained to identify horizontally-mounted gas regulators. If a horizontally-mounted gas regulator is observed, the meter reader then applies a magnet to the diaphragm case of the regulator. All mercury-containing regulators on IP's gas supply system had cast iron diaphragm cases to which a magnet will adhere. If the magnet adheres to the regulator diaphragm case, the meter reader immediately reports the regulator as a candidate for containing mercury by entering an affirmative response to a question specifically placed for this purpose on the hand-held meter data collection device carried by each meter reader. If the screening protocol reflects that a premises does not contain a device that potentially contains mercury, a negative response is entered on the question.

Affirmative responses to the question are reported daily by IP's Information Technology Group to IP's Energy Delivery Group. The Energy Delivery Group notifies the Gas Operations Supervisor ("GOS") of potential mercury-containing regulators identified in the GOS's territory, and the GOS dispatches a trained Gas Service Technician to the location of the device. If the regulator is identified as containing mercury by configuration, brand name, and other identifying features, it has been removed in accordance with IP's procedures for removal of such devices.

Any future regulators which may be identified will not be removed as discussed in response 2 below. If the regulator is identified as not containing mercury, a negative response is entered for the survey question.

2. The above-described visual inspections are being conducted throughout IP's gas delivery service territory. As of the date of this letter, 296,714 meter sets, or 71% of all IP gas meter sets, had been inspected. Five mercury-containing devices have been identified. Four of the devices were actually identified and removed prior to the commencement of the comprehensive survey as a result of heightened awareness of the devices generated by training and other preparation for the survey. Of the four devices located prior to the commencement of the survey, one device was outside an inactive commercial account in Hillsboro, Illinois. One device was outside an inactive account serving a garage in Wood River, Illinois and two were inside residential accounts in East St. Louis, Illinois. The devices were removed as described in IP's response to your September 20, 2000, Request for Information.

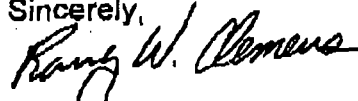
One additional device has been identified to date as a result of the comprehensive survey and it is located inside a residential account in East St. Louis, Illinois. In accordance with the request in your letter dated October 23, 2000, that device, and any additional mercury-containing devices that may be identified, will not be removed until a comprehensive IP plan addressing removal activity has been reviewed by the Attorney General Task Force.

3. Please see answer to Question 1 in IP's response to your Request for Information dated October 6, 2000.
4. IP's reference to the "upgrade" of its low-pressure gas distribution system in its response to Request No. 4 in your letter of September 20, 2000, was to the conversion of the system to a higher pressure system. A primary benefit of this upgrade was to permit the use of smaller diameter pipe throughout the system, and thereby increase the efficiency of the system. During this same period, temperature-compensated gas meters became available which could be placed outside of customers' premises, and which do not require mercury-containing regulators.

IP is continuing to formulate a comprehensive plan that it believes will satisfy any concerns of the Attorney General Task Force relating to its removal activity, or any other aspect of IP's experience with mercury-containing gas regulators. IP hopes to provide a copy of this plan to the Attorney General Task Force in approximately 10 days, and IP appreciates the Task Force's desire to meet to discuss the plan.

Please contact me if you have any questions or comments.

Sincerely,



Randy W. Clemens
Senior Attorney



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

October 23, 2000

Jim Ryan
ATTORNEY GENERAL

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. Randy Clemens
Senior Attorney
Illinois Power Company
500 South 27th Street
Decatur, IL 62521-2200

Re: Request for Information
a. Regulator Removal Procedure

Dear Mr. Clemens:

The Attorney General Task Force has reviewed the document you provided which purports to outline the procedures you developed for the removal of mercury containing regulators. The Task Force is concerned that the procedure as outlined lacks the details necessary to ensure that any such removal activity is conducted safely. Specifically, your procedure does not address OSHA issues and does not contain a QA/QC component or any monitoring program. As your October 6, 2000 communication indicated that you were "presently in the process of formulating both an assessment plan and a response plan to address incidents of spills, the Task Force requests copies of these plans when they are completed. Following receipt of the plans the Task Force would like to meet with you to discuss its concerns. In the interim, the Task Force requests that no mercury containing regulators be removed until such time as a comprehensive plan that has been reviewed by the Task Force is in place, to address any removal activity.

Finally, as a follow up to the responses you provided to my September 20, 2000 request, please provide the following information:

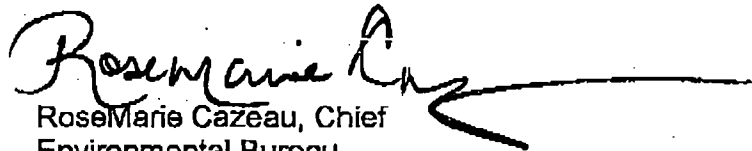
1. Do you have a screening protocol in place as you conduct your inspections to determine the presence of gas pressure regulators or other devices containing mercury? If the answer is in the affirmative, please provide a copy to our Office.

Mr. Randy Clemens
October 23, 2000
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2. Please identify the areas where you are, or have conducted your comprehensive visual inspections to identify gas pressure regulators or other devices containing mercury; state whether you have completed or are close to completing such inspections; the findings made or conclusions reached; the number of such equipment found; and where such equipment are located.
3. In response to Request No. 1 you indicated that you have located three mercury containing regulators, one at an "active residential customer" and two at "inactive customer accounts." Please provide us with a copy of the procedure used to remove these equipment.
4. In your response to Request No. 4 you indicated that Illinois Power "upgraded" from a low-pressure distribution system. What system(s) did you "upgrade" to?

We appreciate your cooperation to date and look forward to hearing from you on or before October 27, 2000.

Very truly yours,



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